



UNITED STATES MARINE CORPS
MARINE CORPS INSTALLATIONS EAST-MARINE CORPS BASE
PSC BOX 20005
CAMP LEJEUNE NC 28542-0005

5090.6.1
G-F/BEMD
28-Apr-2020

Mr. Brad Newland, P.E.
Regional Supervisor
North Carolina Division of Air Quality
Wilmington Regional Office
127 Cardinal Drive Extension
Wilmington, North Carolina 28405-3845

Dear Mr. Newland:

SUBJECT: #6700001 AEROSPACE NESHAP

Attached is a copy of the Semiannual Compliance Status Notification Report for the aerospace maintenance activities at Marine Corps Air Station New River occurring from 1 September 2019 through 29 February 2020. These activities are included in the Marine Corps Base Camp Lejeune Title V Permit 06591T41. This report is completed in accordance with 40 CFR Part 63, Subpart GG - National Emission Standards for Aerospace Manufacturing and Rework Facilities. Copies of the report are being sent to the Environmental Protection Agency, Region IV.

Direct any questions or concerns to Katherine Proffitt, Environmental Quality Branch, Environmental Management Division, G-F, at (910)451-3856.

Sincerely,

TOWNSON.JOH
N.R.1228623
730

Digitally signed by
TOWNSON.JOHN.R.1228
623730
Date: 2020.04.28
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JOHN R. TOWNSON
Director, Environmental Management
By direction of the
Commanding General

Enclosure: Semiannual Compliance Status Notification Report

Copy to:

File(ODI#25508)

EPA Region IV (Mrs. Carol Kemker, Director Enforcement and Compliance Division)

MCASNR/EAD (Mr. Kropinack)

Semiannual Compliance Status Notification Report September 1, 2019 – February 29, 2020

Applicable Rule: 40 CFR Part 63, Subpart GG — National Emission Standards for Aerospace Manufacturing and Rework Facilities. Semi-annual notification is being made in accordance with §63.753(b)(1), (c)(1), (d)(1), and/or (e)(1-6). Annual notification is being made in accordance with §63.753(c)(2) and §63.753(d)(2).

Report Due Date: May 1, 2020

SECTION I GENERAL INFORMATION

A. Print or type the following information for each facility in which aerospace manufacturing and rework operations are performed: (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
06591T41		6700001	
Facility Name			
Marine Corps Base Camp Lejeune			
Owner			
Marine Corps Base Camp Lejeune			
Mailing Address			
COMMANDING GENERAL ATTN: EMD 12 POST LANE CAMP LEJEUNE NC 28547-2540			
City	State	ZIP Code	
Camp Lejeune	North Carolina	28547	
Facility Contact	Title	Phone (OPTIONAL)	
Katherine Proffitt	Air Quality Program Manager	(910) 451-5836	
City	State	ZIP Code	
Camp Lejeune	North Carolina	28547	

B. Check which affected source(s) [as defined by 40 CFR 63.741(c)] were in operation at your facility during the semiannual reporting period:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Hand wipe cleaning (Section III, A) | <input checked="" type="checkbox"/> Primer and topcoat application (Section IV) |
| <input checked="" type="checkbox"/> Flush cleaning (no reporting required) | <input checked="" type="checkbox"/> Depainting operations (Section V) |
| <input checked="" type="checkbox"/> Spray gun cleaning (Section III, B) | <input type="checkbox"/> Chemical milling maskant applications (Section VI) |
| <input checked="" type="checkbox"/> Waste storage and handling (no reporting required) | |

SECTION II CERTIFICATION

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate [§63.9(h)(2)(i)(G)]. The above-mentioned facility has complied with applicable requirements in 40 CFR 63, Subpart GG during the semiannual reporting period as indicated below (check all that apply): [§63.753(b)(1)(v), §63.753(c)(1)(vii), §63.753(d)(1)(ix), §63.753(e)(6)].

APPLICABLE REQUIREMENTS

- ☒ cleaning requirements under §63.744(d)
- ☒ hand-wipe cleaning requirements under §63.744(b)
- ☒ spray gun cleaning requirements under §63.744(c)
- ☒ organic primer and topcoat requirements under §63.745
- ☒ depainting requirements under §63.746
- ☐ chemical milling maskant operations under §63.747
- ☒ recordkeeping under §63.10(b)

FACILITY HAS COMPLIED

- ☒ Yes ☐ No ☐ NA
- ☒ Yes ☐ No ☐ NA
- ☒ Yes ☐ No ☐ NA
- ☒ Yes ☐ No ☐ NA
- ☒ Yes ☐ No ☐ NA
- ☐ Yes ☐ No ☒ NA
- ☒ Yes ☐ No ☐ NA

Signature, Responsible Official

TOWNSON.JOHN.R.12286 23730	Digitally signed by TOWNSON.JOHN.R.1228623730 Date: 2020.04.28 13:36:24 -04'00'	04/28/2020
John R. Townson – Director, Environmental Management Division		Date (mm/dd/yyyy)

SECTION III CLEANING OPERATIONS

A. Hand Wipe Cleaning

1. Have you used non-compliant cleaning solvents on a non-exempt hand wipe cleaning operation during the reporting period? ☐ Yes ☒ No [§63.753(b)(1)(i)]
2. Have you used any new hand wipe cleaning solvents during the reporting period?
☐ Yes ☒ No [§63.753(b)(1)(ii)]

B. Spray Gun Cleaning

1. Did your facility use a noncompliant (i.e. other than enclosed, non-atomized, disassembled, or atomized) spray gun cleaning method during the reporting period? ☐ Yes ☒ No [§63.753(b)(1)(iii)]
2. Did your facility have any instance where a leaking enclosed spray gun cleaner remained unrepaired and in use for more than 15 days during the reporting period?
☐ Yes ☒ No [§63.753(b)(1)(iv)]
3. Do you have additional facility-specific information or comments? ☐ Yes ☒ No

SECTION IV PRIMER AND TOPCOAT APPLICATION

A. Uncontrolled primer and topcoats

1. Did your facility have any instance where primer or topcoat compliance was uncontrolled (e.g. you didn't use averaging or a control device) during the reporting period? ☒ Yes ☐ No
2. If you answered yes, did primer or topcoat values for either H_i (the mass of organic HAP emitted per unit volume of coating as applied, less water) or G_i (the mass of VOC emitted per unit volume of coating as applied, less water and exempt solvents) ever exceed the applicable organic HAP or VOC content limit specified in 63.745(c)? ☐ Yes ☒ No [§63.753(c)(1)(i)]

Coatings used during this semiannual reporting period were either compliant in accordance with 40 CFR 63.745(c), exempt in accordance with 63.745(g), or exempt in accordance with 63.741(g).

B. Controlled primer and topcoats using other than incineration or carbon adsorption

1. Did your facility use any control devices other than an incinerator or carbon adsorber at any time during the reporting period (including dry or wet particulate filters)? ☒ Yes ☐ No [§63.753(c)(1)(v)]
2. If you answered yes, did any of these control devices exceed the operating parameter(s) established under the initial performance test during which compliance was demonstrated? ☐ Yes ☒ No [§63.753(c)(1)(v)]
3. Did your facility have any instance where a primer or topcoat application operation was not immediately shut down when the pressure drop across a dry particulate filter or HEPA filter system, or the water flow rate through a water wash system, or recommended parameter(s) through a pumpless system, was outside the limit(s) specified by the filter or booth manufacturer or in locally prepared operating procedures? ☐ Yes ☒ No [§63.753(c)(1)(vi)]

SECTION V DEPAINTING OPERATIONS

Did your facility repaint more than 6 completed aerospace vehicles during the calendar year?

☐ Yes ☒ No [§63.746]

SECTION VI CHEMICAL MILLING MASKANT APPLICATION OPERATIONS

Did your facility conduct chemical milling maskant operations during the reporting period?

☐ Yes ☒ No [§63.753(e)]

SECTION VII RECORD KEEPING REQUIREMENTS

Is your facility in compliance with record keeping requirements to keep all information (including all reports and notifications) available for inspection for a period of 5 years, and maintain the most recent 2 years on-site? ☐ Yes ☒ No [§63.10(b)]

Form 3 (Monthly Inspection of Operations and Processes Using VOCs) from paint booth C-AS-4106-01 was not filled out for January, February, and March of 2019. To prevent future occurrences, more training was implemented and demonstrations were given to every painter that uses the paint booth. This has already been documented by a Notice of Deficiency issued in September 2019.

SECTION VIII
CHANGES IN INFORMATION ALREADY PROVIDED

Have there been any changes in information already provided for your facility since the NOCS or any subsequent report that have not otherwise been listed in this report and that were not reported within 15 days of making the change? ☐ Yes ☒ No [§63.9(j)]

SECTION IX
ADDITIONAL COMMENTS (OPTIONAL)

Do you have additional facility-specific information or comments you would like to present that have not already been addressed elsewhere in the body of this report? ☐ Yes ☒ No